

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 22-81805-CV-COHN/MATHEWMAN

DANIEL LUGO,

Plaintiff,

v.

JAC 711, LLC,

Defendants.

/

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant, JAC 711, LLC ("Defendant"), pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), files this Motion for Extension of Time to respond to Plaintiff's complaint and as grounds therefore states:

1. Defendant's response to the Complaint is currently due December 23, 2022.
2. Due to the press of other work, counsel for Defendant requests an enlargement of time until January 16, 2023, to respond to the Complaint. In addition, the parties are in settlement discussions and the additional time to respond to the Complaint will aid in that process.
3. This Motion is brought in good faith and not for the purposes of delay.
4. A proposed order granting this Motion is attached hereto.

**WHEREFORE**, Defendant respectfully requests the entry of an order granting an extension of time until January 16, 2023 to respond to the Complaint.

**CERTIFICATE OF GOOD FAITH CONFERENCE; CONFERRED AND AGREED**

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that counsel for the movant has conferred with all parties or non-parties who may be affected by the relief sought in this motion

in a good faith effort to resolve the issues, and counsel for Plaintiff has agreed to the relief sought.

Respectfully submitted,

By: /s/ Sarah Clasby Engel  
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